

# GRANTS MANAGEMENT

## WHAT ADMINISTRATORS NEED TO KNOW

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## Overview

- 1) General Administrative Requirements for Federal Grants
- 2) Program Costs
- 3) Accounting and Reporting Procedures
- 4) Property Management
- 5) Audit Requirements and OPI Monitoring
- 6) Specialized Duties of Recipients
- 7) Federal Maintenance of Effort (MOE) for Title I
- 8) Title I Policy (Reallocation Policy and Comparability)
- 9) Schoolwide Programs

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## I. General Administrative Requirements for Federal Grants

- General Requirements
  - OMB Circular A-133 Compliance Supplement
  - Education Department General Administrative Regulations (EDGAR)
- Applying for Grants
  - E-Grants
  - Competitive and Non-Competitive Grants
- Common and Program-Specific Assurances

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## I. General Administrative Requirements for Federal Grants (cont.)

- ☐ Complaints and Hearings
- ☐ Maintenance of Effort (MOE)
  - ☐ Four Types of MOE: ESEA Title, IDEA, Carl Perkins, Adult Basic and Literacy
- ☐ Matching Requirements
  - ☐ Adult Basic and Literacy Education (ABLE)
  - ☐ Gifted and Talented

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## I. General Administrative Requirements for Federal Grants (cont.)

- ☐ Supplement Not Supplant
- ☐ Carryover Funds
  - ☐ Title I- May carryover up to 15%
  - ☐ Reallocated by state if exceeds
  - ☐ Waiver
- ☐ Private/Nonpublic School Participation

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## II. Program Costs

- ☐ Allowable and Unallowable Costs
  - ☐ Know the ground rules of federal grants management: Title I program rules, OMB Circular A-87
  - ☐ Given the nature of the program and the amount you want to spend, would a "prudent person" understand the decision to spend funds on a particular cost?
    - ☐ Cannot do (e.g. no alcohol)
    - ☐ Must do (e.g. keep time and effort records if paying staff with federal funds)
    - ☐ Might be able to do (e.g. spend money on a certain cost, like a conference or books)

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## II. Program Costs (cont.)

- ☐ Indirect Cost Recovery
  - ☐ Districts apply to the OPI for an approved rate
- ☐ Procurement (Purchasing)
  - ☐ Follow school purchasing laws, 20-9-204, MCA

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## III. Accounting & Reporting

- ☐ Fiscal Control and Accounting Requirements
  - ☐ Can your district describe and document the entire lifecycle of Title I dollars?
- ☐ Amendments
  - ☐ Budget Modifications
  - ☐ Program Modifications
- ☐ Obligations and Expenditures

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## III. Accounting & Reporting (cont.)

- ☐ Time and Effort
  - ☐ Records must show time actually spent
  - ☐ Employee working on multiple grant projects – Personnel Activity Report (PARS)
  - ☐ Employee working on single grant project – Semi-Annual Time Certification
  - ☐ District personnel policy dealing with time and effort
  - ☐ Time and effort considerations for schoolwide programs

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### III. Accounting & Reporting (cont.)

- ☐ Cash Requests
- ☐ Program Income and Interest Earned
- ☐ Records Retention
- ☐ Project Closeout

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### IV. Property Management

- ☐ Equipment and Supplies
- ☐ Rentals and Leases – Federal Restrictions

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### V. Audit Requirements and OPI Monitoring

- ☐ Audits
  - ☐ Expenditures of \$500,000 or more of federal funds per year; Federal Audits (aka "Single Audits" or "A-133 Audits")
  - ☐ Expenditures less than \$500,000 of federal funds per year; Non-Federal (aka "Yellow Book") Audits
- ☐ OPI Monitoring Procedures

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## VI. Specialized Duties of Recipients

- Duties of the Authorized Representative (AR)
  - ▣ Who is the AR?
  - ▣ Role of the AR
- Cooperatives and Consortia
- Pass-Through Entities

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## VII. Federal Maintenance of Effort (MOE) for Title I

- Programs Affected by this Requirement
- General MOE Requirement
- Calculating MOE for Title Programs
- Title I MOE Calculation

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## VIII. Title I Policy (Reallocation Policy and Comparability)

- Reallocation
  - ▣ Sources and Collection of Funds for Reallocation
  - ▣ Timelines
  - ▣ Selection of Programs/LEAs with Additional Needs

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## VIII. Title I Policy (Reallocation Policy and Comparability (cont.))

### ☐ Comparability

#### ☐ Categories

#### ☐ Process (Written Assurances)

#### ☐ Per Pupil Amount

#### ☐ Student/Staff Ratio

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## IX. Schoolwide Programs

### ☐ Eligibility and Purpose

#### ☐ Poverty threshold of at least 40%

### ☐ Comprehensive Schoolwide Plan

### ☐ Preparation and Approval of a Schoolwide Plan

### ☐ OPI Schoolwide Program Plan Template

### ☐ How Schoolwide Programs Affect the Use of Grant Funds

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## IX. Schoolwide Programs (cont.)

### ☐ Ten Components of a Schoolwide Plan

1. Comprehensive needs assessment
2. School reform strategies;
3. Instruction by highly qualified professional staff
4. High-quality and ongoing professional development;
5. Strategies to attract highly-qualified staff;
6. Strategies to increase parental involvement
7. Preschool/other transition strategies;
8. Teacher participation in making assessment decisions;
9. Timely and additional assistance to students having difficulty mastering the standards; and
10. Coordination and integration of federal, state, and local programs and resources.

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## Resources

- OPI State and Federal Grants Handbook,  
<http://www.opi.mt.gov/Finance&Grants>
- Education Department General Administrative Regulations (EDGAR), Part 74 through 86 and 97-99, of Title 34, of the Code of Federal Regulations,  
<http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>
- OMB Circular A-87, Cost Principles for State, Local and Indian Tribal Governments  
[http://www.whitehouse.gov/omb/circulars\\_a087\\_2004/](http://www.whitehouse.gov/omb/circulars_a087_2004/)
- OMB Circular A-102, Grants and Cooperative Agreements with State and Local Governments ,  
[http://www.whitehouse.gov/omb/circulars\\_a102/](http://www.whitehouse.gov/omb/circulars_a102/)

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## Resources (cont.)

- OMB Circular A-133, Audits of States, Local Governments and Non-Profit Organizations; March 2011 Compliance Supplement,  
[http://www.whitehouse.gov/omb/circulars\\_default\\_t](http://www.whitehouse.gov/omb/circulars_default_t)
- Title I Fiscal Issues,  
[www.ed.gov/programs/titleiparta/fiscalguid.doc](http://www.ed.gov/programs/titleiparta/fiscalguid.doc)
- E-Grants,  
<http://opi.mt.gov/Finance&Grants/egrants/>

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